

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

MARY HEATHER MCAFEE, ZAHER MURRAY )	)	
and GEORGE WRIGHT, on behalf of themselves )	)	
and all similarly situated individuals, )	)	
	)	
Plaintiffs, )	)	
	)	
v. )	)	Civil Action No. 3:23-cv-439
	)	
MERIDIANLINK, INC., )	)	
	)	
Defendant. )	)	

---

**DEFENDANT MERIDIANLINK, INC.’S NOTICE OF COMPLIANCE WITH NOTICE  
OF PROPOSED SETTLEMENT OBLIGATIONS UNDER  
THE CLASS ACTION FAIRNESS ACT, 28 U.S.C. § 1715**

---

Pursuant to the Court’s Order Preliminarily Approving Settlement and Directing Notice to Class (ECF No. 73), Defendant MeridianLink, Inc. (“Defendant”) attaches the Declaration of Frank Barkan (the “Declaration”) as Exhibit A, stating that Defendant has served notice of the proposed settlement upon those who are entitled to such notice pursuant to, and in compliance with, the requirements of the Class Action Fairness Act, 28 U.S.C. § 1715 (the “CAFA Notice”).

The attached Declaration further states that on August 1, 2024, the CAFA Notice was sent to the Attorney General of the United States, and mailed to the State Attorney General for 48 states listed on Attachment 1 to the Declaration, the District of Columbia, and to United States Territories. At the direction of the Offices of the Nevada and Connecticut Attorneys General, the CAFA Notice was sent via email.

The CAFA Notice, which is included as Attachment 2 to the Declaration, contained the documents and information required by 28 U.S.C. § 1715(b).

This 21st day of August, 2024.

/s/ Matthew O. Gatewood  
Matthew O. Gatewood  
Virginia State Bar No. 89843  
GATEWOOD PLLC  
1455 Pennsylvania Avenue NW, Suite 400  
Washington, DC 20004  
(202) 464-1441  
[mog@gatewood-law.com](mailto:mog@gatewood-law.com)

*and*

Eileen Hintz Rumfelt\*  
Jason S. McCarter\*  
MILLER & MARTIN PLLC  
1180 West Peachtree Street NW, Suite 2100  
Atlanta, Georgia 30309  
(404) 962-6100  
[eileen.rumfelt@millermartin.com](mailto:eileen.rumfelt@millermartin.com)  
[jason.mccarter@millermartin.com](mailto:jason.mccarter@millermartin.com)  
*\*Admitted Pro Hac Vice*  
*Counsel for Defendant MeridianLink, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing document via Statutory Electronic Service to the following counsel of record:

Kristi C. Kelly  
Andrew J. Guzzo  
KELLY GUZZO PLC  
3925 Chain Bridge Road, Suite 202  
Fairfax, VA 22030

Dale W. Pittman  
LAW OFFICE OF DALE W. PITTMAN, P.C.  
112-A W Tabb Street  
Petersburg, VA 23803-3212

Joseph C. Hashmall  
Eleanor M. Drake  
Zachary M. Vaughan  
BERGER MONTAGUE PC  
1229 Tyler Street NE, Suite 205  
Minneapolis, MN 55413

This 21st day of August, 2024.

By: /s/ Matthew O. Gatewood  
Matthew O. Gatewood